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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Charles Baird et al.,

Plaintiffs,

v.

BlackRock Institutional Trust Company,
N.A., et al.,

Defendants.

Case No: 4:17-cv-01892-HSG

**STIPULATION AND ~~PROPOSED~~ ORDER
TO MODIFY THE CASE SCHEDULE**

Pursuant to Northern District of California Local Rule 6-2, Plaintiffs Charles Baird and Lauren Slayton (collectively, “Plaintiffs”) and Defendants BlackRock Institutional Trust Company, N.A., Blackrock, Inc., the BlackRock, Inc. Retirement Committee, the Investment Committee of the Retirement Committee, the Administrative Committee of the Retirement Committee, the Management Development & Compensation Committee, Anne Ackerley, Catherine Bolz, Chip Castille, Marc Comerchero, Paige Dickow, Daniel A. Dunay, Any Engel, Nancy Everett, Joseph Feliciani, Jr., Michael Fredericks, Corin Frost, Daniel Gamba, Kevin Holt, Chris Jones, Milan Lint, Philippe Matsumoto, Katherine Nedl, John Perlowski, Ann Marie Petach, Andy Phillips, Kurt Schansinger, Tom Skrobe, Jeffrey A. Smith, Joel Davies, John Davis, and Laraine McKinnon (“collectively, “BlackRock”), by and through respective counsel, hereby stipulate and agree as follows:

WHEREAS, on March 24, 2020, the Court entered a Case Management Scheduling Order

1 setting, among other things, rebuttal Reports due by 6/26/2020 and Close of Expert Discovery due
2 by 7/17/2020.

3 WHEREAS, on May 22, 2020, the parties exchanged opening expert reports.

4 WHEREAS, Plaintiffs requested, and BlackRock agreed to, a two week extension to the
5 deadlines for rebuttal reports and the close of expert discovery, due to COVID-19 related
6 disruptions, including lack of childcare, for Plaintiffs' counsel and Plaintiff's expert witnesses who
7 are preparing rebuttal reports.

8 WHEREAS, Plaintiffs also requested, and BlackRock agreed to, dates certain for filing any
9 motions for summary judgment and to reset the hearing date for dispositive motions to December 10,
10 2020.

11 WHEREAS, the parties have not requested any previous modification to March 24, 2020
12 Scheduling Order.

13 A declaration from Michelle C. Yau, setting for the reasons for the parties' request, is
14 attached hereto as Exhibit A ("Yau Decl.").

15 **IT IS HEREBY STIPULATED AND AGREED**, subject to the approval of the Court that:

16 1. The Parties agree there is good cause for a modest extension of the existing case
17 schedule, as detailed below, to accommodate COVID-19 related disruptions. Yau Decl. ¶ 3.

18 The Parties therefore stipulate and agree on the following case schedule:

Event	Current Deadline	Proposed Deadline
Exchange of Opening Expert Reports	5/22/2020	Completed
Exchange of Rebuttal Expert Reports	6/26/2020	7/10/2020
Close of Expert Discovery	7/17/2020	8/7/2020
Dispositive Motions Deadline	---	9/24/2020
Response to Dispositive Motions	---	10/29/2020
Replies to Dispositive Motions	---	11/19/2020
Dispositive Motion Hearing	11/19/2020, 2:00 PM	12/10/2020, 2:00 PM
Pretrial Conference	2/9/2021, 3:00 PM	2/9/2021, 3:00 PM
Seven Day Bench Trial	3/1/2021, 8:30 AM	3/1/2021, 8:30 AM

1 Dated: June 16, 2020

2 **COHEN MILSTEIN SELLERS & TOLL,**
3 **PLLC**

4 /s/ Michelle C. Yau

Michelle C. Yau

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Attorneys for the Blackrock Defendants

19
20 **ATTESTATION**

21 I attest that for all conformed signatures indicated by an “/s/,” the signatory has concurred in
22 the filing of this document.

23 Dated: June 16, 2020

By: /s/ Michelle C. Yau

Michelle C. Yau

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~~PROPOSED~~ ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED: the above Stipulation and Proposed Order Modify the Case Schedule is approved and all parties shall comply with its provisions.

Dated: 7/22/2020



U.S. District Court for the
Northern District of California